

Thank you for examining the state of localism in the current U.S. broadcasting system. Although local services for local listeners has been at the heart of U.S. broadcasting since the 1930s, true local radio services have almost disappeared over the past decade. Programming and playlisting decisions are centralized, DJs voicetrack programming for dozens or hundreds of stations across country, radio contests are run on national scales, syndicated programming dominates AM broadcasting.

While it would be possible to issue regulations that would force stations to produce more programming locally, perhaps it is time for the fundamental structure and organizing principals of U.S. radio broadcasting to be reevaluated.

Instead of stations trying to use programming changes to create a false sense of localism that does little to truly serve the local community, it may be time to completely reallocate spectrum nationwide.

Broadcast licenses could be reissued in blocks that create national and regional networks as well as local stations. This could also help ensure more efficient usage of spectrum resources, reducing any interference concerns created by the rollout of IBOC DAB and possibly even finding room for new operators.

Under such a scheme, national and regional networks could use the same branding and programming throughout their service area, without the pretense of being local stations. And local stations would be truly that -- local programmed and operated. Each market could be structured to ensure a mix of services.

The public would be better served because they would a mix of commercial, probably entertainment-oriented programming that has the national reach and backing to provide a quality product, while retaining local stations that are tailored to the local needs and concerns.

In many ways, this proposal would formalize some aspects of the current state of broadcasting in the post-consolidation age, but with the benefit of making such arrangements transparent, helping the listener make more informed choices about what sort of station/programming they are tuned to.

I realize any frequency plan that called for the rescinding and reallocation of licenses would face significant opposition from many sectors of the industry and the public. It would necessitate new expenses in terms of marketing and infrastructure. However, similar such schemes have proved successful in other nations -- consider the recently completed "zerobase" plan in the Netherlands or the frequency "big bang" proposed in France.

In the long run, it would create a more rational radio broadcasting system that can better serve listeners.